

**AMOS**  
**VS**  
**THE LAMPO GROUP LLC, et al.**

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**DAVID RAMSEY**

**June 21, 2023**



**Lindsey Perry, LCR,RPR, CRR**

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1                   IN THE UNITED STATES COURT  
2                   FOR THE MIDDLE DISTRICT OF TENNESSEE  
3                   AT NASHVILLE

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4                   BRAD AMOS,

5                                   Plaintiff,

6                   vs.

Case No.  
3:21-cv-00923

7                   THE LAMPO GROUP, LLC and  
8                   DAVE RAMSEY,

9                                   Defendants.

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12  
13  
14                   Video/Videoconference Deposition of:

15                   DAVID RAMSEY

16                   Taken on behalf of Plaintiff  
17                   June 21, 2023

18                   Commencing at 10:09 a.m.

19  
20  
21  
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A P P E A R A N C E S

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Also Present:

MS. MARY CIEZADLO - Videographer  
MR. DANIEL CORTEZ - General Counsel,  
Ramsey Solutions  
MR. BRAD AMOS - (via Zoom)

1	your attorneys or anyone else. I'm sure your	02:24:40
2	attorney told you that, so I just wanted to get it	02:24:43
3	on the record.	02:24:45
4	I do want to show you a document.	02:24:45
5	MS. IRWIN: This is Bates stamped	02:24:50
6	LAMPO 101. It's the handbook signed by Brad Amos.	02:24:51
7	I can enter the entire thing as an exhibit. So it	02:24:57
8	begins on LAMPO 98 and then goes through some number	02:24:59
9	uncertain at this moment.	02:25:07
10	MS. SANDERS: Did you say it's the	02:25:11
11	handbook signed by Brad Amos?	02:25:12
12	MS. IRWIN: Yeah.	02:25:14
13	MS. SANDERS: Okay.	02:25:14
14	MS. IRWIN: It's in the initial	02:25:15
15	disclosures.	02:25:17
16	MS. SANDERS: Okay. Thank you.	02:25:17
17	MS. IRWIN: Uh-huh.	02:25:18
18	MS. SANDERS: Can you blow it up just a	02:25:21
19	smidge?	02:25:24
20	MS. IRWIN: Yeah.	02:25:24
21	(WHEREUPON, a document was designated to	02:25:24
22	be marked as Late-Filed Exhibit Number 15, when	02:25:24
23	provided.)	02:25:27
24	BY MR. STREET:	02:25:27
25	Q. Now, Mr. Ramsey, is Lampo a Christian	02:25:27

1	company?	02:25:30
2	A. No. There's no such thing. Our -- no.	02:25:34
3	Q. Okay. Well, this is part of the employment	02:25:44
4	handbook given to employees, which says "The image	02:25:48
5	of Ramsey Solutions is held out to be Christian.	02:25:53
6	Should a team member engage in a behavior not	02:25:57
7	consistent with traditional Judeo-Christian values	02:25:59
8	or teaching, it would damage the issue [sic] and the	02:26:04
9	value of our goodwill and our brand. If this should	02:26:06
10	occur, the team member would be subject to review,	02:26:09
11	probation, or termination."	02:26:12
12	Do you see that?	02:26:13
13	A. Correct.	02:26:13
14	Q. And that is Lampo policy?	02:26:14
15	A. Correct.	02:26:16
16	Q. Okay. So how does that not make Lampo a	02:26:16
17	Christian company if it says "if you engage in	02:26:18
18	behavior not consistent with Christian values or	02:26:21
19	teaching, then" --	02:26:24
20	A. I'm not sure how you define a Christian	02:26:25
21	company, but this is a brand issue. The vast	02:26:28
22	majority of our constituency, our customers are	02:26:35
23	people of faith, and they know I am, and they would	02:26:40
24	lose trust in me if people that worked for me were	02:26:45
25	not adhering to those values. So this is a brand	02:26:49